

Wireless Innovation Pty Ltd ABN 67 605 008 053

Privacy Policy

1. Privacy Policy

1.1 Background

We recognise and value:

- (a) the protection of your personal information; and
- (b) that you have an interest in our collection and use of your personal information.

We have implemented this Privacy Policy in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**), Australian Privacy Principles (**APP**) and other data protection rules in order to be open and transparent about how we collect, hold, and use your personal information, and under what circumstances we may disclose or transfer it.

Please note that this Privacy Policy forms part of the **Wireless Innovation Pty Ltd ABN 67 605 008 053** (WI, we, our, us and other similar term) terms and conditions of our various agreements with you (if any).

1.2 Disclaimer

While your privacy is very important to us, nothing in this privacy policy constitutes a voluntary opt in to any privacy laws, anywhere in the world, which we are not statutorily bound to comply with.

1.3 What is “personal information”?

Personal information held by us may include your:

- (a) name and date of birth;
- (b) residential and business postal addresses, telephone/mobile/fax numbers and email addresses;
- (c) bank account and/or credit card details for agreed billing purposes;
- (d) any information that you provided to us by you during an account creation process or added to your user profile;
- (e) preferences and password for using our software and services;
- (f) your computer and connection information; and
- (g) any information that you otherwise share with us.

1.4 Collection

We collect personal information:

- (a) when you use the <https://partner.wirelessinnovation.com.au> and any associated services or software, including (without limitation) when you:
 - (i) use our software, services or the software and services of any associated third parties under an agreement with us;
 - (ii) create an account;
 - (iii) enter information on software or services which we provide to you;

- (iv) add information to your user profile(s);
 - (v) purchase any services, hardware or software through us or our site;
 - (vi) complete an online contact form to contact us or any third party supplier;
 - (vii) provide information to us by telephone or through marketing forms; or
 - (viii) send us an email or other communication;
- (b) in order to assist you with the supply of products, the provision of services and any related assistance or other purposes requested through such communication.

Information will only be collected directly from you unless you authorise another person to provide the information.

IP addresses

We may also collect Internet Protocol (IP) addresses. IP addresses are assigned to computers on the internet to uniquely identify them within the global network. We collect and manage IP addresses as part of our services, website and for security purposes. We may also collect and use web log, computer and connection information for security purposes and to help prevent and detect any misuse of, or fraudulent activities involving, the website and any products/services.

1.5 Use

The personal information you provide is used for purposes related to our primary business operations, which is providing software and services to third party organisations, government bodies and associated individuals. Examples of when your information may be used include:

- (a) providing you with the products and services you have requested;
- (b) administration needs in relation to providing you with products and service, including your account;
- (c) dealing with requests, enquiries or complaints and other customer care related activities;
- (d) verifying your identity;
- (e) informing you about our products and services;
- (f) assisting you to use functionality on the website or services;
- (g) processing any purchases of services that you may make through us or this site, including charging, billing and collecting debts;
- (h) making changes to your account(s);
- (i) responding to any queries or feedback that you may have;
- (j) conducting appropriate checks for credit-worthiness and for fraud;
- (k) preventing and detecting any misuse of, or fraudulent activities involving, this site, the services or software;
- (l) conducting research and development in respect of our services;
- (m) gaining an understanding of your information and communication needs or obtaining your feedback or views about our services in order for us to improve them;

- (n) maintaining and developing our business systems and infrastructure, including testing and upgrading of these systems,
- (o) marketing our products and services generally; and
- (p) carrying out any activity in connection with a legal, governmental or regulatory requirement imposed on us or in connection with legal proceedings, crime or fraud prevention, detection or prosecution;

and for any other purpose reasonably considered necessary or desirable by us in relation to the operation of our business.

We may also use personal information for purposes (as would be reasonably expected by you) in connection with those activities described above. We will not use your information for purposes other than as described in this privacy policy unless we have your consent, or there are specific law enforcement, public health or safety reasons.

1.6 Third party cookies

In some cases, third parties may place cookies through this site. For example:

- (a) Google Analytics, one of the most widespread and trusted website analytics solutions, may use cookies de-identified data about how long users spend on this site and the pages that they visit;
- (b) Google AdSense, one of the most widespread and trusted website advertising solutions, may use cookies to serve more relevant advertisements across the web and limit the number of times that a particular advertisement is shown to you; and
- (c) third party social media applications (eg, Facebook, Twitter, LinkedIn, Pinterest, YouTube, Instagram, etc) may use cookies in order to facilitate various social media buttons and/or plugins in this site. Log files track actions occurring on the websites, and collect data including your IP address, browser type, internet service provider, referring/exit pages, and date/time stamps.

1.7 Interacting with Us

If you contact us with a general question, we may interact with you anonymously or through the use of pseudonyms.

However, you are required to provide true and accurate details when requesting the supply of products or provision of support services. You agree you will provide accurate information if so required.

1.8 Sharing your Personal Information

We may disclose your personal information to:

- (a) employees, a related company and professional advisors such as our lawyers;
- (b) law enforcement agencies to assist in the investigation and prevention of criminal activities;
- (c) credit-reporting and fraud-checking agencies;
- (d) credit providers (for credit-related purposes such as creditworthiness, credit rating, credit provision and financing);

- (e) government and regulatory authorities and other organisations, as required or authorised by law;
- (f) organisations who manage our business strategies, including those involved in a transfer/sale of all or part of our assets or business (including accounts and trade receivables) and those involved in managing our business risk and funding functions; and
- (g) third party contractors or service providers with whom we have a business association, including:
 - (i) integration providers;
 - (ii) marketing service providers;
 - (iii) accounting service providers; and
 - (iv) information technology service providers including cloud application providers.

We will not disclose your personal information other than in accordance with this privacy policy without your consent. Unless necessary for our business purposes, we will de-identify your information where it is shared with third parties under clause 1.12(g).

1.9 Overseas Disclosure

We may disclose your personal information third party contractors, service providers or customers with whom we have a business association.

While we do not otherwise actively disclose your personal information to overseas entities (unless provided for in a separate agreement with you), we do engage service providers (such as cloud data services or communications providers) who may have international data centres, hardware and disaster recovery sites. Consequently, these providers may have access to your information.

We rely solely on reputable organisations for such cloud services.

1.10 Security of your Personal Information

We store your personal information using servers which have built-in measures to combat unauthorised access, modification or disclosure.

While we endeavour to only hold personal information that is accurate, complete and up-to-date, if you become aware your information is no longer accurate, complete or up-to-date please contact us.

1.11 Disposal of personal information

If we hold personal information about you, and we do not need that information for any purpose, we will take reasonable steps to destroy or de-identify that information, in accordance with the APP and the European Union General Data Protection Regulation (**GDPR**), unless we are prevented from doing so by law.

You may make a request to us in writing to remove your personal information and, where permitted, we will do so in accordance with the APP and the GDPR.

Under Australian law, financial records, such as those relating to financial transactions, must be retained for 7 years after the transactions contemplated by those records are completed.

1.12 How to access your Personal Information

Upon your request and after satisfying ourselves of your identity, we will provide access to your personal information we hold except in certain prescribed circumstances which include, where:

- (a) we believe giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
- (b) giving you access would be unlawful;
- (c) granting that access would have an unreasonable impact on the privacy of other individuals;
- (d) we would be in breach of our obligations under a Technical Assistance Notice (**TAN**), Technical Capability Notice (**TCN**) or Computer Access Warrant (**CAW**) from an Australian Government agency;
- (e) the request for access is frivolous or vexatious; or
- (f) there are anticipated legal proceedings.

We will amend any personal information about you that is held by us and that is inaccurate, incomplete or out of date if you request us to do so. If we disagree with your view about the accuracy, completeness or currency of a record of your personal information that is held by us, and you ask us to associate with that record a statement that you have a contrary view, we will take reasonable steps to do so.

1.13 Third Party Websites

You may click-through to third party websites from this site, in which case we recommend that you refer to the privacy statement of the websites you visit. This Privacy Policy applies to this site only and we assume no responsibility for the content of any third party websites.

1.14 GDPR

We welcome the General Data Protection Regulation (**GDPR**) of the European Union (**EU**) as an important step forward in streamlining data protection globally. Although we do not operate an establishment within the EU and do not target any offering of services towards clients in the EU specifically, we intend to comply with the data handling regime laid out in the GDPR in respect of any personal information of data subjects in the EU that we may obtain.

GDPR rights

The requirements of the GDPR are broadly similar to those set out in the Privacy Act and include the following rights:

- (a) you are entitled to request details of the information that we hold about you and how we process it. For EU residents, we will provide this information for no fee;
- (b) you may also have a right to:
 - (i) have that information rectified or deleted;
 - (ii) restrict our processing of that information;
 - (iii) stop unauthorised transfers of your personal information to a third party;
 - (iv) in some circumstances, have that information transferred to another organisation; and

- (v) lodge a complaint in relation to our processing of your personal information with a local supervisory authority; and
- (c) where we rely upon your consent as our legal basis for collecting and processing your data, you may withdraw that consent at any time.

If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations. However, please be aware that:

- (d) such objection or withdrawal of consent could mean that we are unable to provide our services to you, and could unduly prevent us from legitimately providing our services to other clients subject to appropriate confidentiality protections; and
- (e) even after you have chosen to withdraw your consent, we may be able to continue to keep and process your personal information to the extent required or otherwise permitted by law, in particular:
 - (i) to pursue our legitimate interests in a way that might reasonably be expected as part of running our business and which does not materially impact on your rights, freedoms or interests; and
 - (ii) in exercising and defending our legal rights and meeting our legal and regulatory obligations.

1.15 Compliance with Australian Assistance and Access Legislation

The laws have recently changed here in Australia to compel companies to share data with Australian intelligence agencies and law enforcement, or build in data sharing mechanisms which may report directly to these agencies. While we endeavour to protect your data and our technology from vulnerabilities wherever possible, we can't break the law, nor can we inform you when we've been issued with a notice under the new legislation.

By using our platform or website, you expressly release and indemnify us from any liability to you which arises from sharing data or building data sharing mechanisms (including 'back-doors' and vulnerabilities) into our technology at the direction of Australian Government and its agencies, including where those mechanisms are later exploited by a third party.

1.16 User Security

New digital threats are emerging all the time, and the online environment is more hostile than ever. To protect your data online, including any data or material transmitted by you to us, we recommend reading, implementing and observing any relevant procedures and safety tips recommended by the Department of Industry, Innovation and Science (see - <https://www.business.gov.au/Risk-management/Cyber-Security>) and the Australian Cyber Security Centre (see - <https://www.acsc.gov.au/> and <https://cyber.gov.au>) from time to time.

1.17 Complaints procedure

Your privacy is important to us. If you have a complaint or concerns about our information handling processes as they relate to your personal information, we ask that you first contact our privacy officer whose contact details are listed below.

If, after we have conducted our investigations you are still not satisfied then we ask you consult with:

The Office of the Australian Information Privacy Commissioner
GPO Box 5218

Sydney NSW 2001

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

1.18 How to contact us

If you have any queries, questions, concerns or wish to make a complaint regarding how we deal with your personal information please contact us:

Privacy Officer

Level 1, 16 McDougall St. Milton QLD 4064 Australia

Telephone: +61466815060

Email: support@wirelessinnovation.com

1.19 Amendments to this Privacy Policy

We are obligated to regularly review and update this policy. We therefore reserve the right to amend this Privacy Policy at any time. Should any significant amendments occur, notification will be provided on the website after the changes have been made. Your continued use after you receive the notification indicates your consent to be bound by the amended Privacy Policy.

For further information about privacy in general, please refer to the Office of the Australian Information Commissioner's website located at <http://www.oaic.gov.au> .

Alternatively, please contact our Privacy Officer using the details provided above.

Last amendment date: 4 July 2019